

STEINEL CONSELLORS LAW GROUP
A PROFESSIONAL LIMITED LIABILITY CORPORATION

Walter E. Steinzel
Managing Member

May 25, 2022

VIA US MAIL

Mr. Fethi Orhan
Chief Administrative Officer
Enquire AI, Inc.
1701 Rhode Island Ave., N.W.
Washington, D.C. 20036

Re: Jane Doe v. Cenk Sidar
Case No. 1:22-cv-00545-CMBL-TCB
Eastern District of Virginia
Litigation Hold Letter

Dear Mr. Sidar:

We are counsel to Jane Doe in the matter of *Jane Doe v. Cenk Sidar*, Case No. 1:22-cv-00545-CMBL-TCB, filed May 12, 2022, in the Federal District Court for the Eastern District of Virginia. As her counsel, we issue this litigation hold request requiring Enquire AI, Inc., its affiliates, members and subsidiaries, including but not limited to Global Weeks, collectively "Enquire") to preserve all documents, records and recordings, as more fully described below.

PLEASE NOTE: that Jane Doe's identity is protected by Court Orders entered by the Fairfax County Circuit Court and Federal District Court for the Eastern District of Virginia and is not to be publicly revealed in any manner.

The Complaint is based upon allegations that Mr. Sidar assisted Jane Doe in London during business travel and meetings on and around September 17, 2017. Mr. Sidar has admitted that he was in London for business at least as early as September 12, 2017. Communications and documents that may be relevant to the proceeding cover a period of August 14, 2017, to present, and include but are not limited to e-mails, text messages, phone calls, Air BnB rental records, transportation records, restaurant and business refreshment records and police and related interviews, in addition to other documents or records we may seek in discovery.

At the time of the alleged offense giving rise to the Complaint and through the present, Mr. Sidar was and is a founder and CEO of Global Weeks, Inc., now rebranded as Enquire AI, Inc. During prior proceedings before the Circuit Court of Fairfax County, we sent Mr. Sidar a litigation hold letter demanding preservation of many of the records at issue herein. As he was at that time and still is an officer and co-founder of the predecessor of Enquire, we expect that

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Our prior letter was timely shared with that entity and all records have been preserved. This letter continues and expands on that request.

We hereby notice Enquire not to destroy, delete, conceal or alter any paper or electronic files, documents or information, including but not limited to recordings, texts, electronic mail, SnapChats, WeChats, Instagrams, Facebook or LinkedIn posts, or other messages or posts of any type; WhatsApp, SnapChat, Duo, Telegram, Messenger, Facebook Messenger, Slack, Flangston, Skype or other similar messaging platform messages or files; data generated by, accessed by and/or stored on Enquire's computers, computer systems, smartphones, tablets, iPads, iPhones, smart phones, cell phones, Cloud storage (of any and all types), virtual machines and drives, Dropbox, Google Docs, Google Drive and similar file sharing or collaborative services; blockchain; code; cached messages, images or documents; cookies; metadata; storage media (e.g. USB keys, hard disks, floppy disks, backup tapes); drive, device, system or storage images; data located on retired devices; or any other electronic data, such as voicemail, text messages, email, and audio recordings, regardless of whether any storage media or site is owned, controlled or leased by Enquire or its affiliates, or located in databases, data warehouses, NAS (both local and remote), in transit between servers, virtually used, accessed or stored, located in the metaverse, or in any other vehicle and whether or not encrypted ("Discoverable Data").

To be clear, Discoverable Data includes, but is not limited to, e-mail and other electronic communications, word processing documents, spreadsheets, databases, calendars, telephone logs, contact manager information, Internet usage files, offline storage, Cloud storage, call phone storage, application storage, text communications, images, or information stored on removable media, information contained on laptops, cell phones, notebooks, iPads, tablets or other portable devices and network access information.

Discoverable Data is specifically defined to include, and not be limited to, any and all devices owned by, issued to or used by Mr. Sitar; devices and communications channels used, accessed or owned by Mr. Sitar and either owned by or reimbursed by Enquire; and any and all text or other communications of any type between Mr. Sitar and either Jane Doe or any third party discussing or relating in any way to the events giving rise to the Complaint, related to investigations of Mr. Sitar by the Metropolitan Police of London, or related in any way to the subject matter of the messages referred to in or attached to the Complaint as Exhibit B, and/or any other person or persons that have any reference to or relationship with, whether past or present, any of the matters discussed therein.

In addition to the above, Discoverable Data is defined to include each and all policies of Global Wonks or Enquire, from September 1, 2017, to present, that address, discuss or set standards for the personal or business conduct of any and all employees, officers, directors,

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founders, investors or owners, including but not limited to policies addressing harassment, sexual conduct, business conduct, discrimination, or similar policies.

The scope of this notification relates to Discoverable Data owned, accessed, maintained, or used by, or within the possession, custody or control of, Enquire, both as a company and by any officers, directors, founders, investors, owners or employees in both their personal and professional or business capacity generated, stored or created on or after September 1, 2017, through the present date.

Electronic documents and the storage media on which they reside contain relevant, discoverable information beyond what may be found in printed documents. Therefore, even where a paper copy exists, we seek retention of all documents in their electronic form along with meta data or information about those documents contained on the media. We demand preservation of all meta data, document property fields (unchanged), statistics, version data, author and commenter data and any other digital data associated with any documents, regardless of the data field or document type. We seek retention of paper printouts of only those documents that contain unique information created after they were printed (e.g. paper documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting and redactions) along with any paper documents for which corresponding electronic files exist. In any event, we seek retention of all electronic versions of such documents and all meta data and other statistics related to each and all versions of such documents.

The laws and rules prohibiting destruction of evidence apply to electronically stored information in the same manner that they apply to other evidence. Due to its format, electronic information is easily deleted, modified or corrupted. Accordingly, Enquire must take every reasonable step to preserve this information until the final resolution of this matter. This may include, but would not be limited to, an obligation to discontinue all data destruction and backup tape recycling policies, retrieving equipment in the possession of others and limiting access to files and systems to prevent deletion or destruction of Discoverable Data. We ask Enquire to maintain the highest vigilance to maintain all Discoverable Data.

In addition to previously created documents, with regard to electronic data created subsequent to the date of delivery of this letter, relevant evidence should not be destroyed and your company is to take the appropriate steps required to avoid destruction of such evidence.

In responding to this letter, please retain, including but not limited to, all Discoverable Data including but not limited to each and every file and record over which Enquire, prior counsel, advisors, officers, investors, third parties or others, have control which pertain to the subject matter of this Notice. The following list is not comprehensive but is intended to provide

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an overview of file types and locations likely to contain Discoversive Data, and may be redundant in some aspects.

- File drawers
- Desk and office drawers
- Personal file systems (hard copy and electronic)
- Smartphones
- Cell phones, iPhones, iPads, and others, whether owned or controlled by children, parents, spouses, consultants, advisors, others or personal
- Cloud storage, application storage, virtual storage, meta storage
 - o Active e-mails
 - o Archived e-mails
 - o Deleted e-mails
 - o E-mails in folders
 - o Attachments to messages
 - o Photographs
 - o Audio or video recordings
 - o Text messages
 - o Messenger, Instagram, WeChat, WhatsApp, SnapChat, Duo, Telegram, Message, Facebook Messenger, Slack, Hangouts, Skype and all other messaging platform messages
 - o Messages stored in messaging, the internet or other apps
 - o Cloud application storage
 - o Cloud storage and all backups
 - o App storage
 - o Backups to computers or restoration files
 - o Malware, device and file system images
 - o Data whether in-transit or held virtually
 - o Encryption routines or storage
 - o Meta locations
- Computers and laptops, whether or not owned or controlled by children, parents, spouses, consultants, advisors, others or personal
 - o Active and archived e-mails
 - o E-mails in folders
 - o Attachments to e-mails
 - o Documents on hard drives
 - o Documents on portable media, including floppy disks, CDs or memory sticks
 - o Documents, files, code or other information located in Cloud or shared storage

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- All backups
- Manage backup programs including but not limited to:
PhoneView and similar mobile device backup and imaging
programs
- Applications, Cloud and virtual or VM programs and applications
- All stored data and messages
- All Group Chat, We Chat, Instagram, WhatsApp, Facebook,
LinkedIn, Twitter, and all similar platforms
- All third-party systems storing information
- All backups

*Failure to abide by this request could result in severe penalties and could form the basis of a
legal claim for spoliation. We intend to litigate any spoliation against all parties to the full
extent of the law.*

*Please forward a copy of this letter to all persons and entities with custodial responsibility
for the items referred to in this letter, including now or former counsel, if any, who may have
access to shared systems.*

If this correspondence is in any way unclear, please contact me immediately.

Thank you for your attention to this matter.

Very truly yours,



Walter E. Stroma, Jr.

CC: Thomas E. Urban, II